

**UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF NORTHERN CALIFORNIA**  
**SAN FRANCISCO DIVISION**

NASSER HAMEDANI, an individual  
doing business as GLOBAL VISION  
UNLIMITED,

Plaintiff,

vs.

BAYER CORPORATION, an Indiana  
corporation, BAYER HEALTHCARE  
LLC, a Delaware Limited Liability  
Company,

Defendants.

Case No.: C05-02781 MJJ

**STIPULATION AND [PROPOSED] ORDER  
CHANGING TIME OF ADR AND  
DISCOVERY DEADLINES**

Courtroom: 11

Judge: Honorable Martin J. Jenkins

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel of record for Plaintiff Nasser Hamedani ("Hamedani") and Defendants Bayer Corporation and Bayer Healthcare LLC (collectively, "Bayer"), that the there is good cause to continue the ADR and discovery deadlines as set forth herein.

Pursuant to Civil L.R. 6-2(a), the undersigned counsel of record declare that:

(1) On March 1, 2006, Defendants served their first set of written discovery requests to Plaintiff. Plaintiff responded to Defendants' written discovery requests on May 1, 2006. On March 7, 2006, Plaintiff served his first set of written discovery requests to Defendants. Defendants responded to Plaintiff's written discovery requests on June 8, 2006. Counsel for the parties have had several discussions about deposition dates. Currently, Plaintiff and Defendants plan to depose three witnesses each prior to engaging in mediation. All six depositions are tentatively planned to take place in August, 2006. Due to scheduling conflicts that caused minor delays in the depositions and discovery, the parties request some additional time to complete discovery and an additional 20 days to prepare for the Court-sponsored Mediation.

1           (2)     On November 10, 2005, the Court initially set the deadline for Mediation on May  
2     31, 2006. Pursuant to a stipulation by the parties on April 11, 2006, the Court continued the  
3     Mediation deadline to August 31, 2006. The parties request an additional 20 days to conclude  
4     the Mediation. The discovery schedule was first set by the Court's Pretrial Order of March 7,  
5     2006.

6           (3)     This is the parties' first request to modify the discovery schedule. The requested  
7     changes will not impact the trial date, the settlement conference date, or the date by which  
8     dispositive motions must be heard.

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Pursuant to Civil L.R. 6-2, the parties stipulate to and request an order changing the following deadlines:

- (a) The deadline for the Mediation will be **September 20, 2006**.
- (b) Non-expert Discovery cutoff will be **November 17, 2006**.
- (c) Designation of Experts will be due by **October 30, 2006**.
- (d) Expert Reports will be due by **November 6, 2006**.
- (e) Designation of Supplemental/Rebuttal Experts will be due by **December 4, 2006**.
- (f) Supplemental/Rebuttal Reports will be due by **December 4, 2006**.
- (g) Expert discovery cutoff will be **December 22, 2006**.

Respectfully submitted,

Dated: July 13, 2006

/s/ Patrick E Guevara  
Attorneys for Plaintiff

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Patrick E. Guevara

Dated: July 13, 2006

/s/ Danielle B. Lemack  
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**THE FOREGOING STIPULATION IS  
APPROVED AND IS SO ORDERED.**

Dated: July 18, 2006

  
UNITED STATES DISTRICT JUDGE